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12 Attorneys for Defendant
13 Apple Inc.

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION
18

19 COREPHOTONICS, LTD.,
20 Plaintiff,
21 v.
22 APPLE INC.,
23 Defendant.

Case No. 3:17-cv-06457-JD (lead case)
Case No. 5:18-cv-02555-JD

**DECLARATION OF LOWELL D.
MEAD'S IN SUPPORT OF APPLE'S
MOTION TO STRIKE
COREPHOTONICS'S EXPERT'S
UNDISCLOSED NEW
INFRINGEMENT THEORIES**

Date: February 29, 2024
Time: 10:00 a.m.

Courtroom 11, 19th Floor
450 Golden Gate Avenue,
San Francisco, CA 94102

1 I, Lowell D. Mead, hereby declare:

2
3 1. I am a partner with the law firm of Cooley LLP, counsel of record for Apple, Inc. in
4 this matter. I have personal knowledge of the facts set forth in this declaration and, if called to testify
5 as a witness, could and would testify competently thereto.

6 2. I submit this declaration in support of Defendant Apple Inc.'s Motion to Strike
7 Corephotronics's Expert's Undisclosed New Infringement Theories.

8 3. In 2018, Apple produced source code and other technical documents for the iPhone 7
9 Plus product. In late 2022 through April 2023, Apple produced extensive technical documentation
10 and source code for the products accused of infringement in Corephotronics's Amended Disclosure of
11 Asserted Claims and Infringement Contentions, served July 26, 2022.

12 4. Attached as **Exhibit A** is a true and correct copy of Exhibit A to Corephotronics's
13 Disclosure of Asserted Claims and Infringement Contentions, served April 11, 2018.

14 5. Attached as **Exhibit B** is a true and correct copy of Exhibit L to Corephotronics's
15 Amended Disclosure of Asserted Claims and Infringement Contentions, served July 26, 2022.

16 6. Attached as **Exhibit C** is a true and correct copy of Amended Exhibit L to
17 Corephotronics's Second Amended Disclosure of Asserted Claims and Infringement Contentions,
18 served August 2, 2023.

19 7. Attached as **Exhibit D** is a true and correct copy of excerpts from the Expert Report of
20 Dr. John C. Hart, served December 18, 2023

21 8. Attached as **Exhibit E** is a true and correct copy of Apple developer webpage
22 summarizing features of iPhone and iPad cameras, dated 2017, from the Internet Archive Wayback
23 Machine.

24 9. Attached as **Exhibit F** is a true and correct copy of www.iFixit.com webpage with
25 reference to iPhone 7 plus Teardowns, dated September 15, 2016, from the Internet Archive Wayback
26 Machine.

27 10. Attached as **Exhibit G** is a true and correct copy of Apple support webpage with
28 reference iPhone 7 Plus Technical Specifications, dated September 9, 2016.

11. Attached as **Exhibit H** is a true and correct copy of Apple developer website webpage discussing tone mapping.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 25th day of January, 2024 in Palo Alto, CA.

/s/ Lowell D. Mead

Lowell D. Mead